

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
XL SPECIALTY INSURANCE COMPANY,

Case No. 08-CV-3821 (GEL)

Plaintiff,

v.

JOHN D. AGOGLIA, et al.,

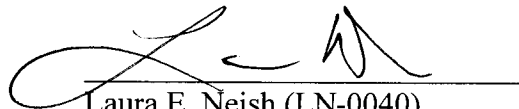
Defendants.
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**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the annexed Affirmation of Laura E. Neish, Esq., in support of this motion, and the Declaration of Norman L. Eisen and Certificates of Good Standing annexed thereto, Laura E. Neish, an attorney duly admitted to practice in this Court, hereby moves this Court, on behalf of defendant Tone Grant, for an Order granting the admission *pro hac vice* of Norman L. Eisen, Esq., to argue or try the above-referenced case, in whole or in part.

Dated: June 26, 2008
New York, New York

Respectfully submitted,



Laura E. Neish (LN-0040)
Zuckerman Spaeder LLP
1540 Broadway, Suite 1604
New York, New York 10036
Tel: 212-704-9600
Fax: 212-704-4256
lneish@zuckerman.com

Attorneys for Defendant Tone Grant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XL SPECIALTY INSURANCE COMPANY,

Case No. 08-CV-3821 (GEL)

Plaintiff,

v.

JOHN D. AGOGLIA, et al.,

Defendants.
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**AFFIRMATION OF LAURA
E. NEISH IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

LAURA E. NEISH hereby affirms and states:

1. I am an attorney at law, duly admitted to practice before the courts of the State of New York and the United States District Court for the Southern District of New York.

2. I am associated with the firm of Zuckerman Spaeder LLP, which represents Defendant Tone Grant in the above-referenced matter.

3. I am fully familiar with all of the relevant facts and circumstances herein.

4. I respectfully submit this affirmation in support of the accompanying motion to admit Norman L. Eisen to practice *pro hac vice*, on behalf of Defendant Tone Grant, in the above-captioned matter.

5. Mr. Eisen is a partner at Zuckerman Spaeder LLP, 1800 M Street NW, Washington, DC 20036, where he practices in the areas of complex civil litigation, securities litigation, and bankruptcy. Mr. Eisen is duly admitted to practice in the courts of Maryland and the District of Columbia. There are no pending disciplinary proceedings against Mr. Eisen in any

State or Federal court.

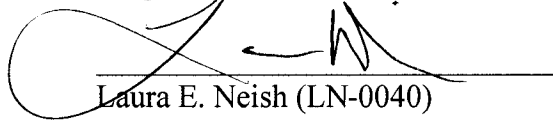
6. Mr. Eisen has been engaged to represent Tone Grant in the above-referenced matter.

7. The Declaration of Mr. Eisen is attached hereto as Exhibit A. Certificates of Good Standing from the Court of Appeals of Maryland and the District of Columbia Court of Appeals are attached hereto as Exhibit B. Mr. Eisen is prepared to comply with all rules of conduct applicable to lawyers admitted to practice in the Southern District of New York as well as the Individual Practices of this Court.

8. Accordingly, I respectfully request that this Court permit Norman L. Eisen to appear pro hac vice on behalf of Tone Grant in connection with the above-captioned matter.

Dated: June 26, 2008
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Laura E. Neish', is written over a horizontal line.

Laura E. Neish (LN-0040)

Zuckerman Spaeder LLP

1540 Broadway, Suite 1604

New York, New York 10036

Tel: 212-704-9600

Fax: 212-704-4256

lneish@zuckerman.com

Attorneys for Defendant Tone Grant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XL SPECIALTY INSURANCE COMPANY,

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Defendants.
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**DECLARATION OF
NORMAN L. EISEN IN
SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE***

NORMAN L. EISEN, pursuant to 28 U.S.C. § 1746, hereby declares the following under penalty of perjury:

1. I am a partner at the law firm of Zuckerman Spaeder LLP, 1800 M Street NW, Washington, DC 20036, where I practice in the areas of complex civil litigation, securities litigation, and bankruptcy. I have been engaged to represent Defendant Tone Grant in the above-captioned matter.
2. I submit this Declaration in support of the accompanying motion for admission to appear pro hac vice on behalf of Mr. Grant in this matter.
3. As indicated in the Certificates of Good Standing attached hereto, I am an attorney duly admitted to practice in the courts of the State of Maryland and the District of Columbia.
4. There are no pending disciplinary proceedings against me in any State or Federal court. I am prepared to comply with all rules of conduct applicable to lawyers admitted to practice in the Southern District of New York as well as the Individual Practices of this Court.

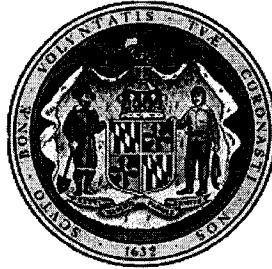
5. Accordingly, I respectfully request that I be permitted to appear pro hac vice on behalf of Tone Grant in the above-captioned matter.

Executed this 25th day of June 2008

A handwritten signature in black ink, appearing to read "Norman L. Eisen", written over a horizontal line.

Norman L. Eisen

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the seventeenth day of December, 1991,*

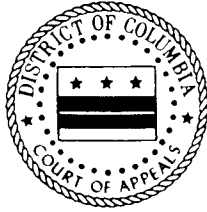
Norman L. Eisen

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
fourth day of June, 2008.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

NORMAN L. EISEN

was on the 13TH day of NOVEMBER, 1992

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 4, 2008.

GARLAND PINKSTON, JR., CLERK

By: *M. Charles*
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XL SPECIALTY INSURANCE COMPANY,

Case No. 08-CV-3821 (GEL)

Plaintiff,

v.

JOHN D. AGOGLIA, et al.,

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Defendants.
-----X

Upon the motion of Laura E. Neish, attorney for defendant Tone Grant, and Laura Neish's affirmation in support:

IT IS HEREBY ORDERED that

Norman L. Eisen
Zuckerman Spaeder LLP
1800 M Street, N.W., Suite 1000
Washington, D.C., 20036
Tel.: 202-778-1800
Fax: 202-822-8106
neisen@zuckerman.com

is admitted to practice *pro hac vice* as counsel for defendant Tone Grant in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: June __, 2008
New York, New York

Honorable Gerard E. Lynch
United States District Court Judge

CERTIFICATE OF SERVICE

I, Jer-Wei Chen, hereby certify that on June 26, 2008, I caused a true and correct copy of the Notice of Motion to Admit Counsel *Pro Hac Vice* and Affirmation of Laura E. Neish in Support of Motion to Admit Counsel *Pro Hac Vice* to be served upon the following parties via first-class mail:

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Jaeckel, Thomas H. Lee, Joseph Murphy,
Ronald L. O'Kelley and Scott A. Schoen*

s/ Jer-Wei Chen
Jer-Wei Chen

Jer - Wei Chen